

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

C.H., et al.,

Plaintiffs,

Case No. 1:25-cv-680

v.

Hon. Hala Y. Jarbou

EAST LANSING PUBLIC SCHOOLS, et
al.,

Defendants.

_____ /

ORDER

Plaintiffs C.H. and R.H., who are proceeding on behalf of their child, have filed a complaint that does not identify their full names.¹ The Federal Rules of Civil Procedure require that a complaint “name all the parties.” Fed. R. Civ. P. 10(a). “Plaintiffs are permitted to proceed under pseudonyms only under certain circumstances that justify an exception to this rule.” *Citizens for a Strong Ohio v. Marsh*, 123 F. App’x 630, 636 (6th Cir. 2005). “Ordinarily, a plaintiff wishing to proceed anonymously files a protective order that allows him or her to proceed under a pseudonym.” *Id.* “Failure to seek permission to proceed under a pseudonym is fatal to an anonymous plaintiff’s case, because, as the Tenth Circuit has held, ‘the federal courts lack jurisdiction over the unnamed parties, as a case has not been commenced with respect to them.’” *Id.* at 637 (quoting *Nat’l Commodity & Barter Ass’n v. Gibbs*, 886 F.2d 1240, 1245 (10th Cir. 1989)).

¹ Their full names appear on an attachment to the complaint. (ECF No. 1-1, PageID.69.)

Plaintiffs did not file a motion seeking permission from the Court to proceed under pseudonyms. A complaint is not a formal request for such permission. Moreover, Plaintiffs' complaint does not discuss the factors that the Court must consider when examining such a request. *See Doe v. Porter*, 370 F.3d 558, 560 (6th Cir. 2004).

Accordingly, **IT IS ORDERED** that Plaintiffs **SHOW CAUSE** within seven days of the date of this order why this Court should not dismiss the complaint for lack of jurisdiction or for failure to seek leave to proceed under a pseudonym. Plaintiffs may show cause by providing reasons for proceeding pseudonymously or by filing an amended complaint with their full names. In any event, Plaintiffs can continue using a pseudonym for their child.

Dated: June 23, 2025

/s/ Hala Y. Jarbou
HALA Y. JARBOU
CHIEF UNITED STATES DISTRICT JUDGE